

# **CLEC DELAYED EXHIBIT 134**

Investigation Into Ameritech Wisconsin's Unbundled Network Elements  
Docket No. 6720-TI-161  
July 3, 2001

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6720-TI-161

REINHART | BOERNER | VAN DEUREN  
NORRIS & RIESELBACH, S.C.

ATTORNEYS AT LAW

July 6, 2001

HAND DELIVERED

Jeffrey J. Patzke  
Administrative Law Judge  
Public Service Commission of Wisconsin  
610 North Whitney Way  
Madison, WI 53707-7854

RECEIVED  
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WISCONSIN PUBLIC SERVICE  
COMMISSION

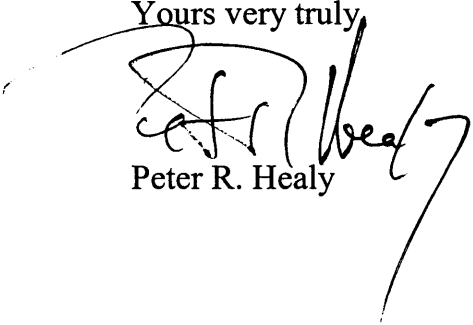
Dear Hearing Examiner Patzke:

Re: Investigation Into Ameritech  
Wisconsin's Unbundled Network  
Elements  
Docket No. 6720-TI-161

Pursuant to the amended post-hearing schedule in this proceeding, enclosed for filing are 20 copies of CLEC Delayed Exhibit 134. Upon the filing of these documents, please file-stamp the enclosed copy of this letter and return it to our messenger.

If you have any questions concerning this matter, please feel free to contact me. Thank you for your consideration.

Yours very truly

  
Peter R. Healy

MADISON\82083PRH:SLH

Encs.

cc Service List (w/o enc.)

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**Public Service Commission of Wisconsin  
Docket No. 6720-TI-161  
Ameritech Wisconsin's Responses to  
CLEC Coalition 6th Set of Data Requests  
Response Due Date 01/16/01**

**Request # 1:** In ARPSM, please identify all pieces of switch equipment associated with call set up. For those pieces of equipment identified, please provide specific Tabs and cell references.

**Response:** The Ameritech Regional PIP Switching Model (ARPSM) is the application of the single price methodology to the terms of the PIP contracts. The model calculates a single, average price of the various products sold through these contracts. It does not identify individual equipment associated with call set up.

BEFORE THE  
PUBLIC SERVICE COMMISSION OF WISCONSIN

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Investigation into Ameritech Wisconsin's  
Unbundled Network Elements

Docket No. 6720-TI-161

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**SEVENTH SET OF DATA REQUESTS  
TO AMERITECH WISCONSIN**

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**A. INSTRUCTIONS**

1. Ameritech Wisconsin shall fully respond to these requests and forward all responsive documents to the undersigned. The definitions and instructions contained in the First Set of Data Requests to Ameritech Wisconsin are to be observed.
2. Ameritech Wisconsin shall respond at the earliest practicable date, and in any event not later than February 19, 2001. Ameritech Wisconsin shall not hold responses until all responses are completed. As responses are ready to one or more Data Requests, those responses shall be produced immediately.

**B. DATA REQUESTS**

1. Dr. Aron at page 32 of her Rebuttal Testimony describes Ameritech's need to maintain spare capacity for purposes of accommodating the "variability of demand" faced by Ameritech in servicing its Wisconsin customers. Please provide the following information for purposes of analyzing how Ameritech's current, actual fill allows Ameritech to successfully accommodate such variability:
    - a. Please provide all "quality of service" information that has been provided by Ameritech Wisconsin to the Wisconsin Public Service Commission or its Staff over the past 12 months. Your complete answer will include any reports, letters, Memos, or other documentation describing Ameritech ability to (1) provision service within given time intervals following a customer's order, (2) intervals between reported trouble and "clearing" of
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- c. Please provide the total number of unbundled, "P Phone Business Set" unbundled loops Ameritech Wisconsin has provisioned for CLEC's in the following years: 1998, 1999, 2000.
4. Mr. Florence states as follows at page 3 of his Rebuttal Testimony: "...the use of UDLC remains the forward looking, least cost method of extracting or grooming individual unbundled loops served by Digital Loop Carrier (DLC) systems including the Litespan DLC systems being deployed by Project Pronto." Please provide responses to the following questions regarding Mr. Florence's statement.
  - a. Please provide any quantitative analysis wherein Ameritech has compared the costs of providing unbundled loops via Integrated DLC versus providing unbundled loops using Universal DLC. Your complete answer will include any cost study undertaken to determine the costs of providing unbundled loops using IDLC, any analysis aimed at determining the comparative costs of using IDLC versus UDLC for unbundled loops, any vendor generated material that supports or refutes Mr. Florence's testimony or any other document that would assist in comparing the costs of providing unbundled loops using IDLC versus UDLC.
5. Mr. Florence at page 6 of his Rebuttal Testimony states as follows: "...all other means of unbundling individual loops from a digital bit stream are more costly and inefficient, requiring the use of additional equipment and facilities that are over and above the cost of the DLC equipment included in the unbundled loop cost study." Please separately identify each piece of "additional equipment and facilities . . . over and above the DLC equipment included in the unbundled loop cost study" to which Mr. Florence refers.
  - a. Please provide the current, discounted contract price for each piece of equipment Mr. Florence separately identifies in response to the question above.
6. Ms. Flatt states as follows at page 8 of her Rebuttal Testimony: "... even where such a capability is available in Ameritech Wisconsin's Project Pronto deployment, multiple switch hosting is a very inefficient arrangement, and would result in much higher costs to Ameritech Wisconsin and the CLECs." Please respond to the following questions regarding Ms. Flatt's testimony.
  - a. Has Ameritech ever used the "multiple switch hosting" features of its Project Pronto equipment so as to determine the efficiencies of the system? If so, please provide a detailed description of any such experiment/trial and provide any documentation including conclusions reached by the parties involved.

**Public Utilities Commission of Wisconsin**  
**Docket No. 6720-TI-161**  
**Ameritech Wisconsin's Responses to**  
**CLEC Coalition 7<sup>th</sup> Set of Data Requests**  
**Response Due Date 2/19/01**

**Request # 4a:** Mr. Florence states as follows at page 3 of his Rebuttal Testimony: ". the use of UDL,C remains the forward looking, least cost method of extracting or grooming individual unbundled loops served by Digital Loop Carrier (DLC) systems including the Litespan DLC systems being deployed by Project Pronto." Please provide responses to the following questions regarding Mr. Florence's statement.

- a. Please provide any quantitative analysis wherein Ameritech has compared the costs of providing unbundled loops via Integrated DLC versus providing unbundled loops using Universal DLC. Your complete answer will include any cost study undertaken to determine the costs of providing unbundled loops using IDLC, any analysis aimed at determining the comparative costs of using IDLC versus UDLC for unbundled loops, any vendor generated material that supports or refutes Mr. Florence's testimony or any other document that would assist in comparing the costs of providing unbundled loops using IDLC versus UDLC.

**Response:** Ameritech Wisconsin objects to this request because it seeks confidential and proprietary information. Ameritech Wisconsin will provide the referenced information only in accordance with applicable protective orders and confidentiality agreements executed between the parties and acceptable to the vendors. Moreover, Ameritech Wisconsin objects that the request is vague, overly broad, and unduly burdensome to the extent it seeks "any other document" that would assist in comparing IDLC versus UDLC unbundled loop costs.

Without waiving the foregoing objections, Ameritech Wisconsin responds as follows:

Mr. Florence's statement was based on consultation with SBC's Network Regulatory organization and, most recently, Ms. Flatt who is a member of that organization. In Section IV of her rebuttal testimony, Ms. Flatt addresses from a qualitative perspective why IDLC cannot be efficiently or cost effectively unbundled. No specific analysis has been performed to quantify the additional costs that would be incurred.